



**THE CITY OF NEW YORK
LAW DEPARTMENT**

100 CHURCH STREET
NEW YORK, NY 10007

ZACHARY W. CARTER
Corporation Counsel

SAMANTHA P. TURETSKY
Assistant Corporation Counsel
Labor & Employment Law Division
(212) 356-2451
sturetsk@law.nyc.gov

December 26, 2018

BY ECF

Honorable Paul G. Gardephe
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Maya Zabar v. New York City Department of Education, et al.
Docket No. 18-CV-06657 (PGG)

Dear Judge Gardephe:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, counsel for the Defendant Board of Education of the City School District of the City of New York ("BOE") (also known as and sued herein as the "New York City Department of Education") and the individually named Defendants Marisol Rosales, Manuel Ureña, Lynn Rosales, and Sari Perez.

Plaintiff has not filed a second amended complaint by the filing deadline set forth in the Civil Case Management Plan and Scheduling Order. ECF Dkt. 43. Defendants will proceed with their motion to dismiss the Complaint, which was discussed at a conference held on November 29, 2018.

The parties have conferred and agreed to the following briefing schedule:

- Defendants will file their motion to dismiss on or before January 11, 2019.
- Plaintiff will file her opposition to Defendants' motion to dismiss, if any, on February 11, 2019.
- Defendants will file their reply on or before February 25, 2019.

Accordingly, the parties request that the Court approve the above briefing schedule for Defendants' motion to dismiss the First Amended Complaint in this action.

Respectfully submitted,

/s/ Samantha P. Turetsky

Samantha P. Turetsky

Assistant Corporation Counsel

cc: Bryan D. Glass, Esq. (Via ECF)
Glass & Hogrogian LLP
Attorneys for Plaintiff
85 Broad Street, WeWork - 18th Fl.
New York, NY 10004
(212) 537-6859
bglass@ghnylaw.com